MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) COMPLIANCE INSPECTION

EVALUATION CONDUCTED: September 14, 2011
FINAL REPORT DATE: December 19, 2011

CITY OF POST FALLS
MS4 PERMITTEE
IDAHO

United States Environmental Protection Agency
Region 10
1200 Sixth Street
Seattle, WA 98101

Contents

Section 1.0 Introduction

In the summer of 2011, Julie Congdon, Compliance Officer, U.S. Environmental Protection Agency (EPA) Region 10, conducted a file review of the City of Post Falls' Municipal Separate Storm Sewer System (MS4) Program. All of the MS4 Annual Reports were reviewed for compliance with the permit requirements. On September 14, 2011, an EPA Region 10 inspection team conducted a field inspection of the Pocatello MS4.

Discharges from the City's MS4 are regulated under the National Pollutant Discharge Elimination System (NPDES) Permit No. IDS-028231 of Section 402(p) of the Clean Water Act, 33 U.S.C. §1342(p), and EPA's "Phase II" regulations for MS4 discharges, published in the Federal Register on December 8, 1999, 64 Fed. Reg. 68722 (hereafter, the Permit). The Permit is the first NPDES MS4 permit issued to the City of Post Falls (hereafter, the City). The City submitted an application for NPDES permit coverage dated March 2003, and an application amendment in November 2007. The City received confirmation of coverage from EPA effective January 1, 2009 and was subsequently issued NPDES Permit No. IDS-028231.

The City owns and/or operates a MS4 within the Coeur d'Alene Urbanized Area located in Kootenai County, Idaho. The City covers 11.4 square miles. Less than 1% of the City is served by traditional collection and conveyance systems; these systems discharge to the Spokane River from five outfalls: the Centennial Trail Outfall, the 4th Avenue Outfall, the Spokane Bridge Outfall, the Ponderosa Outfall, and the Polites Park Outfall. The City directly abuts the Spokane River. While soils allow infiltration of rain and snowmelt in much of the greater Coeur d'Alene area, the City's MS4 also discharges to waters of the U.S. during wet weather. The Spokane River supports cold water aquatic life, salmonid spawning, primary contact recreation, wildlife habitats and aesthetics, and domestic water supplies.

The primary purpose of the file review and field inspection was to assess the City's compliance with the requirements of the Permit through an assessment of the City's implementation of applicable program elements. Specifically the file review and field inspection included an evaluation of the following program areas or elements, which are described in the Permit:

Part II.B.1	Public Education and Outreach
Part II.B.2	Public Involvement/Participation
Part II.B.3	Illicit Discharge Detection and Elimination (IDDE)
Part II.B.4	Construction Site Stormwater Runoff Control
Part II.B.5	Post-Construction Stormwater Management

Part II.B.6	Pollution Prevention and Good Housekeeping for Municipal Operations
Part II.C	Discharges to Water Quality-Impaired Receiving Waters
Part IV	Monitoring, Recordkeeping, and Reporting Requirements

The EPA Inspection Team, Sandra Brozusky, Dustan Bott and Julie Congdon, conducted a series of interviews with members of the City's staff, along with several site visits and field verification inspections. Clear and sunny weather conditions were experienced during the inspections. The primary representatives involved in the inspection were the following:

City of Post Falls Representatives: (Present during inspection)	-Terry Werner, Public Services Director 208-262-7353, twerner@postfallsidaho.org -Richard Froehlich, Chief Operator for Water Reclamation Division, 208-773-1438, dickf@postfallsidaho.org -Robert Palus, P.E, Assistant City Engineer, 208-773-4235, rpalus@postfallsidaho.org -James Mulcahy, Staff Engineer, 208-773-4235, jmulcahy@postfallsisaho.org -Adam Tate, Stormwater Technician, 208-773-3511 -Hazel Day, Administrative Assistant, 208-773-3511
Credentials Presented To:	Terry Werner and Richard Froehlich
EPA Inspectors:	Julie Congdon, EPA Region 10 Dustan Bott, EPA Region 10 Sandra Brozusky, EPA Region 10

The EPA inspection team Mr. Werner, Mr. Froehlich and Ms. Day were present during the opening conference and initial discussions prior to the field portion of the inspection. June Bergquist with Idaho Department of Environmental Quality was present during the opening conference and initial discussions but departed just prior to the field portion of the inspection. Mr. Palus, Mr. Mulcahy, and Mr. Tate joined the inspection team during the field portion of the inspection. We were not denied access to any facility or outfall location and were allowed to inspect any area we requested. Following the field inspection we had a closing conference where we discussed an area

of concern identified. Mr. Werner, Mr. Froehlich, Mr. Palus and Mr. Tate were present during the closing conference.

On July 6, 2011 EPA provided an informal verbal notification for the inspection and inspection dates to Mr. Werner. In addition, an official notification letter was sent on July 28, 2011 to the City of Post Falls. Mr. Werner replied with a voicemail to Ms. Congdon on July 7, 2011 accepting the proposed inspection dates. Mike Neher (City of Post Falls Environmental Coordinator) sent email to Ms. Congdon on September 9, 2011 that he would not be present for the inspection. During the inspection introductions, Mr. Werner indicated that Mr. Neher was the official stormwater representative but would not be present for the inspection.

Section 2.0 Permit Compliance Review

The EPA Inspection team conducted an evaluation of the City's MS4 program to assess compliance with the requirements of the Permit and their implementation of applicable program elements to ensure an effective MS4 program. As stated previously, the City maintains coverage for discharges from its MS4 under NPDES Permit No. IDS-028231. The Permit became effective on January 1, 2009.

As required by Part II.B of the Permit, "Minimum Control Measures," the Permittee must accomplish six minimum control measures through their Storm Water Management Program (SWMP). The City is required to fully implement its SWMP within four years of January 1, 2009. Based on a review of the conditions of the Permit and the City's Annual Report, only those program elements required two years from the permit effective date should have been fully implemented and functional at the time of the inspection.

The following sections discuss the findings from the file review, conducted by Ms. Congdon, and the field inspection, conducted by Ms. Brozusky, Mr. Bott and Ms. Congdon. The presentation of file review and inspection findings in this section of the report does not constitute a formal compliance determination or violation. All referenced documentation used as supporting evidence is provided in Appendix A, and photo documentation is provided in Appendix B.

Section 2.1 Annual Report

The purpose of an Annual Report is to document implementation of the SWMP during the previous year; evaluate program results and describe planned changes towards continuous improvement of the program. It should also include appropriate program budget information, and a summary of any required monitoring data.

A file review of the MS4 was conducted by Ms. Congdon in advance of the field inspection. All of the MS4 Annual Reports were reviewed for compliance with the permit requirements. Only the 2009 Annual Report had been received by EPA; the 2010 Annual Report was not in the compliance files. The compliance officer was able to download and print a copy of the 2010 Annual Report via the City's stormwater webpage (**http://www.postfallsidaho.org/street_water/Water/stormwaterreport.pdf**). Overall, the information provided in the Annual Report was good but some information was lacking. In order to get a clearer understanding about the City's compliance, EPA provided a list of questions to the City (hereafter Question 1, Question 2, etc.) in advance of the field inspection, requesting additional information to augment the information provided in the Annual Reports. The responses from the City are noted in the bulleted sections below.

Section 2.2 Public Education and Outreach

Part II.B.1 of the Permit requires the Permittee to implement a public education program to educate the community about the impacts of stormwater discharges to the MS4 and local waterbodies, in accordance with the specific requirements at Part II.B.1.a-e of the Permit.

Findings from the File Review

1) Per Part II.B.1.a of the Permit, the Permittee is required to develop and implement within two years of the effective date of the Permit a public education program to educate the community about the impacts of stormwater discharges on local waterbodies and the steps that the community can take to reduce pollutants in stormwater runoff. Scant information was provided in either Annual Report regarding their education program. In the 2010 Annual Report, the City included a copy of a press release submitted to the local paper, the Coeur d'Alene Press. It is unknown if the newspaper published an article or announcement related to the information submitted by the City. Similarly, no information was provided regarding how the City met the requirements of Part II.B.1.b-c.
    - EPA asked the City how it has tracked behavior changes in their general and target audiences for public education around stormwater. In response to Question 3, the City noted that the "City has not tracked public behavior changes. It does not appear to be a permit requirement." While not a permit requirement, it remains necessary to know what the City is doing to meet Part II.B.1.a-c of the Permit. In addition, the City does not appear to have a method to determine the effectiveness of its public education and outreach program.

- EPA also asked the City that, while not a requirement of the Permit, if it engages in household hazardous waste collection events via other departments or services. In response to Question 4, the City noted that the Post Falls Police Department provides a service for citizens to dispose of unused prescription medications, helping to keep those chemicals out of the solid waste and wastewater treatment systems.

Findings from Field Inspection

At the time of inspection, Mr. Werner, Mr. Froehlich and Ms. Day discussed the City's public education and outreach program and efforts. The City has participated in an environmental open house, created and hosted by the City of Coeur d'Alene in September 2010 and 2011. According to Mr. Werner, this open house is an opportunity for the public to attend and ask questions regarding stormwater management. Beyond the open house, the City distributes education materials through their website, at the public library, at wastewater treatment plant (WWTP) tours with grade school students, the local television station, and individual citizen education on proper swale operation (through complaint responses).

Mr. Werner indicated that for the 2012 year, the City will spend $12,000 on mailing stormwater education and outreach materials to the public (a grant received from the Aquifer Protection Council). In addition to the mailing, the City provides information on swales to all builders and developers that work within the City. Mr. Werner indicated that the City's target audience was grade school students who attend the wastewater treatment plant tours in hope that the students will pass the information to their parents.

At the time of inspection, EPA was provided a packet that contained the information the City provided to the students. In general, the packet contained documents on keeping grease out of drains, wastewater treatment plant operations, aquifer illustrations, grassy swale maintenance tips, and an overview of the City's stormwater management, medication turn in program and a bag of wildflower seeds.

During the discussion, EPA inquired if the City's press release (provided in the annual report) was published by the newspaper in an article or an announcement. The City indicated that an article included in the newspaper was not specific to the City and generally described the environmental open house. The City was unclear if the press release was actually published in the newspaper. Per part II.B.1.c of the permit, the City must prepare and distribute appropriate information relevant to the SWMP to the local newspaper and at least one media outlet.

Section 2.3 Public Involvement/Participation

Part II.B.2 of the Permit requires the Permittee to provide the public an opportunity in the development and implementation of the public involvement program.

Findings from the File Review

1) In Part II.B.2.b of the Permit, the Permittee must within two years of the effective date of the Permit make all SWMP documentation and Annual Reports available online through its regularly maintained website. On August 22, 2011, upon clicking the "Storm Water Report" link on the website, http://www.postfallsidaho.org/psstormwater.html, only the 2010 Annual Report was posted.

Findings from Field Inspection

At the time of inspection, Mr. Weber indicated that the 2010 annual report (posted on the City's website) includes the 2009 annual report. Other information contained on the website, according to Mr. Weber, includes grassy swale maintenance tips and a field guide for stormwater erosion and sediment control. The City stated that the media relation department will update the site regularly or can make updates as requested.

Section 2.4 Illicit Discharge Detection and Elimination

Part II.B.3 of the Permit requires the Permittee to develop, implement and enforce a program to detect and eliminate illicit discharges to the MS4 in accordance with the specific requirements in Part II.B.3.a-g of the Permit. .

Findings from the File Review

1) Per Part II.B.3.a of the Permit, within two years from the effective date of the Permit, the Permittee's Illicit Discharge Detection and Elimination (IDDE) program must include training for City staff on how to respond to reports of illicit discharges. No information was provided about staff training in either Annual Report.
    - In Question 5, the City was asked to provide a description of the staff training on stormwater, including a summary of what topics were covered in the training, date that the training occurred, a list of what City departments were in attendance, etc. In response, the City noted that City staff were trained on the dates noted in the table below. The City stated that the staff were trained via stormwater management video training modules from the Texas Commission on Environmental Quality and USEPA.

Training Date	City Division	Training Module
11/10/10	Fleet Maintenance	Fleet Maintenance
11/10/10	Street Maintenance	Streets and Drainage
11/3/10	Parks Maintenance	Fleet Maintenance, Land Disturbance, Material Storage, Parks and Grounds, Solid Waste, Streets and Drainage
10/28/10	Engineering	Fleet Maintenance, Land Disturbance, Material Storage, Parks and Grounds, Solid Waste, Streets and Drainage
11/2/10	Water Reclamation	Land Disturbance
11/1/10	Building Permits	Land Disturbance, Streets and Drainage
11/1/10	Water Operations	Land Disturbance

2) Per Part II.B.3.a of the Permit, the Permittee must develop an information management database system to track the activities and actions of the program. The 2010 Annual Report lacked sufficient information regarding this system.
   - EPA requested a copy of the information management database system utilized for tracking the program. In response to Question 6, the City stated, "At this early time in the permit cycle, we have no reports of illicit discharges to the MS4 system. When such reports are received, the information will be entered into the Stormwater Program Implementation file and followed up according to established procedure."
3) Per Part II.B.3.b, the City has enacted an ordinance prohibiting non-stormwater discharges into the MS4. The City has also developed a written policy of enforcement escalation procedures for stormwater offenders. Regarding Part II.B.3.c of the Permit, no local controls or conditions have been placed on non-stormwater discharges.
4) The MS4 maps included in the EPA's files for this Permit lacked information on jurisdictional boundaries; location of all City-owned or operated storm sewers, culverts, ditches, and other conveyances; locations of all inlets and outfalls, including their latitude and longitude, and diameter of all outfalls; names and locations of all waters that receive discharges from those outfalls; points at which the City's MS4 is interconnected with other MS4s; and locations of all municipally-owned or operated facilities, including maintenance/storage facilities and public or private snow disposal sites. Per Part II.B.3.d, the Permittee must submit to EPA as part of the corresponding Annual Report a copy of the completed map(s), as both a report and as an electronic file via Arc GIS format. This was not provided in the 2010 Annual Report.
   - In advance of the inspection, EPA requested the City to provide a copy of the MS4 map denoting the previously noted information. In response to Question 7, the City stated, "The stormwater system map is formatted in Portable Document Format (PDF) and is not currently available as an ARC GIS file. A copy of the file is attached to the electronic submittal of this

letter or it can be accessed at: http://www.postfallsidaho.org/psengineering.html. The compliance officer visited the website and reviewed the posted map available via the "Post Falls Stormwater MS4 Map" link; information is still needed regarding interconnections with other MS4s, locations of maintenance/storage facilities and snow disposal sites.

5) Based on the file review, it is unclear how the City has met Part II.B.3.e of the Permit wherein the Permitttee within two years from the effective date of the Permit must begin an ongoing education program to inform staff, businesses and the public about the hazards from illegal discharges.

Findings from Field Inspection

During the inspection, EPA inquired the City if they had received and reports of illicit dischargers in their MS4 system. The City stated that they have not had any reports. The City speculated that they had not received any reports based on the light commercial industry (dry cleaners, used car lots) that is included within the MS4. Mr. Werner indicated that City does have a granite operation business however, this operation discharges to a swale, not into the MS4. Should the City need to follow up on a report of an illicit discharger, a procedure is in place to first use in-house employees (environmental department) to response to the discharger. If the discharger does not come into compliance the City would use code enforcement to issue tickets. As of the inspection date, the City has not had to do any enforcement for illicit dischargers.

EPA asked about the City's Stormwater Program Implementation file (as mentioned in the City's response to the pre-inspection questions). Mr. Froehlich described this file as a system to track illicit dischargers, should the City discover one. City officials were unsure if the system was a database or Excel spreadsheet and indicated that Mr. Neher (who was not present) would have the most knowledge of the system. EPA inquired if the City had completed or had plans to complete screening of pipes within the MS4, to which the City replied that they have not and do not have plans to conduct pipe screening for illicit dischargers.

Following the file review, the City's MS4 map did not appear to include information on interconnections with other MS4s, locations of maintenance/storage facilities and snow disposal sites. During the inspection, the City indicated that their MS4 does not interconnect with another city or highway district MS4. The City does have maintenance/storage facilities located at the wastewater treatment plant and the "street and fleet" facility. Both of these locations discharge to swales. In addition, the City stated that snow is disposed of at the "street and fleet" facility and the "3rd avenue parks" facility. While these locations were not included on the MS4 map at the time of inspection, the City identified them to be outside of the City's MS4 system.

In regard to the City's education program, under the IDDE program, Mr. Weber indicated that city officials/employees are educated on spill response and containment and maintenance for stormwater best management practices. At the time of inspection, the City appeared to include a limited audience in the community for education on IDDE. It was unclear how the City targeted an audience specifically for the MS4 IDDE program (i.e. users of the MS4 system, general public, and businesses as referenced in section II.B.3.e of the permit), outside of grade school students.

Section 2.5 Construction

As stated in Part II.B.4 of the Permit, the Permittee "must develop, implement, and enforce a program to reduce pollutants in storm water runoff to the MS4 from construction activities resulting in land disturbance of one acre or more". The program must include, at a minimum, the specific requirements in Part II.B.4.a-h of the Permit. Based on the implementation plan and time frames required in the Permit, the construction-related program elements should be fully implemented at the time of inspection.

Findings from File Review

1) Per Part II.B.4.b, the City has provided appropriate information to operators of construction projects about the NPDES Construction General Permit for Idaho. The City provided notice to building and development owners and contractors on March 24, 2009.
2) In Part II.B.4.c of the Permit, the Permittee is required to adopt within two years of the effective date of the Permit an ordinance for construction site operators to practice appropriate stormwater controls. The City adopted this ordinance in 2010.
3) It is unclear how the City has published and distributed information regarding the construction stormwater ordinance for construction site operators, as required in Part II.B.4.d.
4) Due to the lack of information in the Annual Reports, it was unknown as to how many construction plans were reviewed and/or approved, per Part II.B.4.e of the Permit.
    - In response to Question 6, the City noted that "Within the City limits, a total of 557 construction plans were reviewed and approved per Part II.B.4.e. of the permit between July 1, 2009 and June 31, 2011. Construction plans include any permit that would have involved some amount of excavation / earthwork including new or additions to single family homes, new or additions to commercial sites, public rights-of-way construction, retaining walls and parking lots. Of those plans, 37 were within the boundaries of the MS4 or located adjacent to the Spokane River

and were reviewed accordingly. The process to address deficiencies in the plans is to provide comments and require re-submittals."

- EPA also asked about the training of the staff that review erosion and sediment control plans, including when and how often they are trained in plan review. In response to Question 9, the City stated, "Plan reviews are conducted by in-house engineers and technicians. In-house training and development is continual. Outside specialized training is provided when available locally."

5) It was unknown via the information provided in the Annual Reports and on the City's website how the City addressed CGP coverage in its contracts for construction projects.
    - In order to better assess the City's compliance with Part II.B.4.h of the Permit, EPA requested a copy of the contract used by the City for all public construction projects. EPA also inquired about the City's policy regarding Construction General Permit (CGP) coverage for projects disturbing less than one acres of land but are part of a larger common plan of developing disturbing one or more acres of land. In response to Question 10, the City provided a copy of the City of Post Falls' standard contracting documents for construction projects; the contract includes text notifying the contractor of its duty to comply with the CGP. The City also stated, "Yes, it is City policy that Construction General Permit (CGP) coverage is obtained by all projects disturbing less than one acre of land but are part of a larger common plan of developing disturbing one or more acres of land."

Findings from Field Inspection

Mr. Weber indicated during the inspection that the City's stormwater ordinance and information on stormwater BMPs are included on the City's website. Also, Mr. Weber indicated that a City engineer, who works on and approves construction plans, will relay stormwater information to the developer. This information will be relayed to the developers through plan review and feedback and includes ensuring stormwater control measures are in project plans. In general, City engineers will provide information during the review period of a project; however the City has not proactively distributed information outside the City's website. According to Mr. Weber, the City relies on the pre-construction plan review process to ensure that developers and contractors for city projects comply with the Construction General Permit. EPA asked if the reviewing engineers receive training on stormwater best management practices, to which the City replied that the reviewing engineers are certified Professional Engineers. It was unclear at the time of inspection if the reviewing engineers received specific stormwater training.

Mr. Weber indicated there have been limited construction projects within the City. At the time of inspection, there was one construction project ongoing located on the North end of the City, outside the MS4 boundary.

Section 2.6 Post-Construction

The requirements in Part II.B.5 of the Permit must be completed within three years of the effective date of the Permit (except for Part II.B.5.d, which is four years), thus the City was not evaluated on these components.

Findings from File Review

There was no information in the Annual Reports regarding components of the City's Post Construction program but with consideration of the requirements' deadlines, this area did not need to be evaluated at this time.

Section 2.7 Pollution Prevention and Good Housekeeping

Part II.B.6 of the Permit requires the Permittee to develop and implement an operation and maintenance program to prevent or reduce pollutant runoff from municipal operations. The program must include, at a minimum, the specific requirements in Part II.B.6.a-d of the Permit.

Findings from File Review

1) Per Part II.B.6.a of the Permit, within two years from the effective date of the Permit, the Permittee must develop and implement an operation and maintenance program to prevent pollutant runoff from municipal operations. The status of this program was unknown based on the information provided in the Annual Reports. EPA requested further information on the following activities and items: use of sand and road deicers, including the storage locations of and/or amounts used of deicing salts and/or abrasives, storage locations of and/or amounts used of pesticides and fertilizers in municipal maintenance and operations; fleet maintenance and vehicle washing operations, street cleaning and maintenance, grounds/park and open space maintenance operations, building maintenance, solid waste transfer activities, water treatment plant operations, stormwater system maintenance, snow removal practices, snow disposal site operations and maintenance, materials storage, hazardous materials storage, used oil recycling, spill control and prevention measures for municipal refueling facilities, and municipal golf course maintenance.
    - In response to Question 11, the City noted that "none of the City's buildings or maintenance facilities discharge to the MS4 system". The City added that the City doesn't store sand or deicer, and that "those items are purchased on an as-needed basis from Post Falls Highway District". The

City noted that the City used 76,774 gallons of deicer (magnesium chloride mixture), and 145 tons of sand. Regarding fleet maintenance and vehicle washing, fleet vehicles are washed at the Fleet Maintenance and Utility Maintenance buildings at 2002 W Seltice; the water goes to either sand separators and the sewer, or to swales". Also, the City stated, "Street sweeper loads are taken to the PFHD pit on Prairie Avenue, or to the City's 3rd Avenue maintenance yard where it is picked up and taken to the PFHD pit. Sweepers are washed out at the Streets Maintenance yard and the water goes to the field on the north side of the City property. Roads in the MS4 are swept monthly from April through October. Less than 5 yards of debris are removed from these areas each month. Maintenance of the MS4 system includes cleaning of gutters and catch basins on an as-needed basis. Typical debris includes leaves, pine needles, sand and grit". Regarding snow removal, the City notes, "Any snow that is removed from streets is placed at the City's 3rd Avenue maintenance yard and/or at the north field at the maintenance yard on Seltice."

- EPA also inquired as to which areas within the MS4 are targeted for higher frequency of maintenance, and what criteria are used to determine what areas necessitate more maintenance, including who makes such a determination. In response to Question 12, the City stated, "Higher traffic areas (Seltice Rd) typically get more maintenance. The criteria used are: 1) road debris and 2) poorly draining catch basin. The Stormwater Technician and the Streets Supervisor determine the frequency and locations".
- EPA asked for information regarding the number and frequency of inspections at municipal facilities, including maintenance yards. The City replied in its answer to Question 13, "None of the City's facilities discharge to the MS4, however the maintenance yards and City Hall have been inspected once during this permit cycle".
- Additionally, EPA requested information regarding the number and frequency of catch basin inspections and cleanings, street sweeping frequency and miles covered, the number and frequency of pipe inspections and cleaning, the number and frequency of inspections and/or cleaning of stormwater management structures, both those that are publicly-owned and privately-owned, and the frequency of open channel inspections and cleaning. In response to Question 14, the City noted, "Catch basins were cleaned on Seltice between Chase and the RR crossing in April 2011. Street sweeping of roads in the MS4 occurs monthly, April through October". The City states that the total length of the road system within the MS4 area is 4 miles, comprising 2.9% of the City's total road system. The City also stated that the MS4 only has catch basins and pipes and has no stormwater management structures nor open

channels. The City noted, "There have been no MS4 pipe inspections or cleanings since 2009".

- To get a better understanding about the maintenance of the MS4, EPA requested numbers and data regarding the volume and/or weight of trash and debris removed from the area of the MS4. In response to Question 15, the City stated that "Cleaning the streets removes less than 5 cubic yards of dirt and debris per month from the MS4".
- With regard to the training as required in Part II.B.6.b of the Permit, EPA asked for a description of the training for municipal employees, including a list of what City departments were in attendance (who presented the training, who received the training), date that the training occurred, etc. In response to Question 16, the City provided a similar response as to the one regarding training in the section on IDDE; City staff were trained on various dates using stormwater management video training modules developed by the Texas Commission on Environmental Quality and USEPA.

Findings from Field Inspection

The City conducts catch basin cleaning on an as-needed basis. The City determines when to clean catch basins depending on a couple of factors including the activity level of the road and the level of rainfall.

In response to Question 11, the City mentioned that they do not have a refueling station. At the time of inspection, the City stated that they use in-town service stations to refuel the City fleet.

In terms of employee training, the City includes good housekeeping and pollution prevention topics in training provided once per year. The City also maintains a sign-in sheet to track employees and approves the agenda for the training.

Section 2.8 Monitoring, Recordkeeping and Reporting Requirements

As stated in Part II.C of the Permit, the Permittee must monitor and report on discharges to water quality-impaired receiving waters. Additionally, per Part IV.C of the Permit, the Permittee is required to report on the stormwater discharge monitoring data and Spokane River water monitoring data it has collected.

Findings from File Review

1) There was no information in the Annual Reports regarding pollutants of concern discharged from the MS4, per Part II.C.1. EPA requested the City to list the pollutants of concern.

- In response to question 17, the City noted those pollutants comprise Lead, zinc, phosphorus, nitrogen, sediment, dissolved oxygen, and temperature.

2) Per Part II.C.3 of the Permit, within one year from the effective date of the Permit, the Permittee's Annual Report must include a description of how the activities noted in Part II.B will be targeted by the Permittee to control the discharge of pollutants of concern. There was no information in either Annual Report regarding this requirement.
    - EPA requested the City to describe specifically how it is evaluating and measuring the effectiveness of the SWMP in controlling the discharge of pollutants of concern. In response to Question 18, the City answered, "Since permit issuance in 2009, we have sampled each permitted outfall location a total of 9 times. We do not have sufficient experience with the program to determine control methods or to measure effectiveness of control measures. This will take more time. Right now, we are developing baseline data. From this limited data we can make some general conclusions about the data. These data are for first flush grab samples, which are higher than would be the average concentration during any storm event. General observations of the data are: PCBs are non-detect, lead is less than 0.02 mg/L, TSS is 10 – 100 mg/L, TP is less than 1 mg/L, TN is between 1 and 50 mg/L, zinc is less than 0.5 mg/L, hardness is between 10 and 100 mg/L. Whether the pollutant loads have a significant impact on the Spokane River, or how these loads might be controlled has not yet been determined".
    - EPA also asked the City to specifically identify how it is evaluating and measuring the effectiveness of the SWMP to control the discharge of the pollutants of concern per Part II.C.3. In its response to Question 19, the City noted, "The City is still working through the program development requirements of the 2009 MS4 permit. We do not have sufficient data to make a determination of the controls needed (if any) or their effectiveness. Please see the response to question 18 above".
3) In Part IV.A.5 of the Permit, the Permittee must conduct a stormwater discharge monitoring program no later than 18 months from the effective date of the Permit. The City commenced monitoring in advance of the Permit's deadline; the first monitoring began on August 12, 2009.

Findings from Field Inspection

Prior to conducting the inspection, EPA reviewed monitoring results conducted by the City of the "4th Avenue" and "Centennial Trail" outfalls, included in the 2010 annual report. Results from stormwater monitoring of the "Centennial" outfall included total suspended solids (TSS) levels of 545 mg/L, 328 mg/L and 960 mg/L for March, May and August 2010, respectively. EPA inquired if the City had suggestions for the levels of TSS reported. Mr. Froehlich indicated that the first rain of the year will generally wash

sediment fines remaining on the road, which the sweeper truck didn't pick up. However, with these monitoring events, the precipitation was 0.08 inches on 3/16/10, (Wunderground.com listed the day as rainy with a high of 66°F and precipitation of 0.03), 0.21 inches on 5/19/10 (Wunderground.com listed the day as rainy with a high of 73°F and precipitation of 0.03), 0.05 on 8/11/10 (Wunderground.com listed the day as partly cloudy with a high of 80°F and precipitation of 0.01). The precipitation during these monitoring events was not of the level that would serve to flush out the storm sewer lines. It was suggested by June Bergquist that construction projects in the City may impact the TSS level, however Mr. Froehlich stated that there is limited construction within the MS4 boundaries and would be unlikely to contribute. The City was unclear if there were other contributing factors outside a first rain event.

The City talked in general about the process of collecting stormwater samples at the monitoring locations. Mr. Froehlich indicated that the WWTP has a rainwater collection container with a float valve. With a given amount of rain, the float valve will trigger a signal, which in turn notifies the City's stormwater technician to take stormwater samples. The stormwater technician will respond to the notification within thirty minutes to sample at the monitoring locations.

The field portion of the inspection included viewing the "4th Avenue," "Centennial Trail," "Spokane Street," "Ponderosa" and "Polites Park" outfalls. Photographs and details of "4th Avenue," "Centennial Trail," "Spokane Street," outfalls are included in Appendix B of this report. Information gathered in the field included distances from outfall to receiving waters and is included in the caption of the photographs in this report, with exception to "Ponderosa" and "Polites Park" outfalls. The distances of these two outfalls to the Spokane River were estimated to be 715 feet and 1050 feet, respectively. All distances were provided by Mr. Palus and other city engineers who used GIS mapping for measurement.

Area of Concern:
The following area of concern was discussed with Mr. Werner, Mr. Froehlich and Mr. Palus during the closing conference of the inspection. Per part IV.A.2 of the permit the permittee must develop and conduct a monitoring program to estimate the pollutant loading currently discharged from the MS4s, assess the effectiveness and adequacy of control measures implemented through this permit and identify and prioritize those portions of the MS4 requiring additional controls. City officials did not appear to assess the effectiveness and adequacy of control measures as a result of the TSS monitoring results. While the permit does not specifically identify discharge limitations, the City did not describe an approach to assessing whether the current control measures were effective for TSS, at the time of inspection. In addition to TSS, monitoring results reported temperatures for "4th Avenue" outfall of 71° and 64° F for August and September 2010, respectively. Monitoring results for "Centennial Trail" outfall reported

temperatures of 66° and 62° F for August and September 2010, respectively. City officials indicated in the closeout meeting, that the monitoring results were considered to be normal and as a result did not raise a concern to assess control measures.

Section 3.0 Additional Observations and Recommendations for Improved Stormwater Management by the Permittee

During the inspection Mr. Werner described the City's MS4 generally. He indicated that there are approximately 4 miles of road system or about 54 acres of land would that contribute to the MS4. He also briefly described that any new construction within the City boundaries will include either retention basins or swales and dry wells for stormwater collection and will not contribute to the existing MS4 system. In addition, the City does not discharge stormwater into the City's sanitary system.

EPA inquired about future compliance dates and whether the City had begun efforts to reach compliance deadlines. In regard to dry weather field screening, the City had already begun checking two monitoring outfalls a couple times a month during dry weather. In regard to an inventory for industrial facilities, the City will utilize the business licensing program to help determine if a facility has a potential to discharge into the MS4 system. The industrial pretreatment program will inspect facilities permitted for pretreatment for connections to the MS4 system. The City currently has three facilities permitted for pretreatment, however, these facilities are located outside the MS4 boundaries.

It is recommended that the City engage more actively in household hazardous waste collection events. At such events, the City could directly educate the public on the important role the public has in safely disposing of these wastes rather than allowing them to leak and get pollutants into stormwater.

It is recommended that the City change their construction contract boiler plate amendment language, in terms of where to direct questions about the CGP. The public has access to an EPA hotline number (800.424.4372) where questions about the CGP can be fielded by EPA staff.

Sandra Brozusky _____

Dustan Bott _____

Julie Congdon _____

Appendix A:
Exhibit Log

Pre-Inspection Questionnaire

City of Post Falls Responses

Appendix B:
Photograph Log

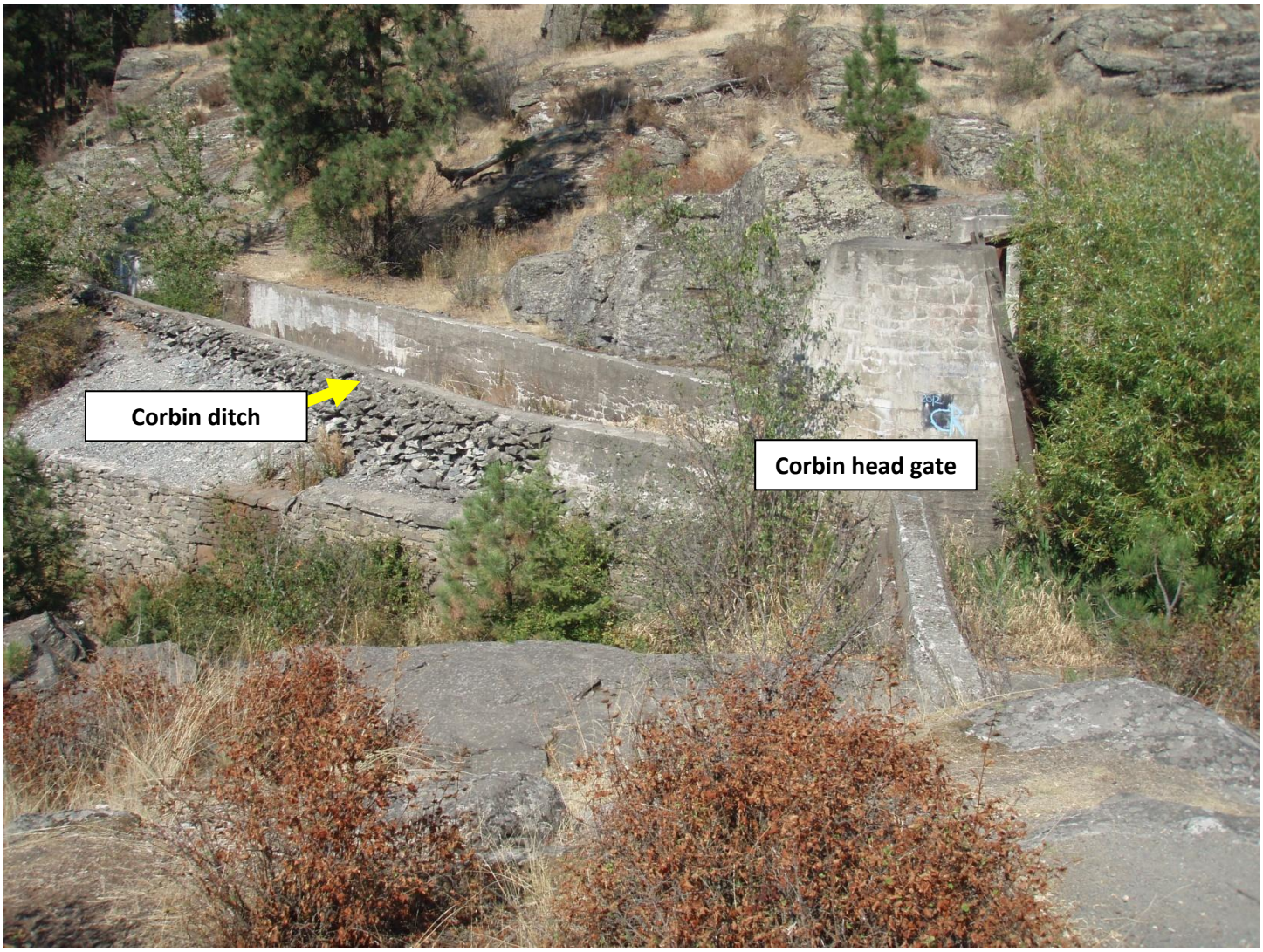
(All photographs taken by Dustan Bott on September 14, 2011 unless otherwise noted)

Photograph 1 (P9140514): View of the "4th Avenue" outfall. The photographer is standing on 4th avenue. At the time of inspection, there was a discharge out of this outfall.

Photograph 2 (P9140517): Another view of the "4th Avenue" outfall. At the time of inspection, there was a discharge out of this outfall.

Photograph 3 (P9140518): Close up of the water located below the "4th Avenue" outfall.

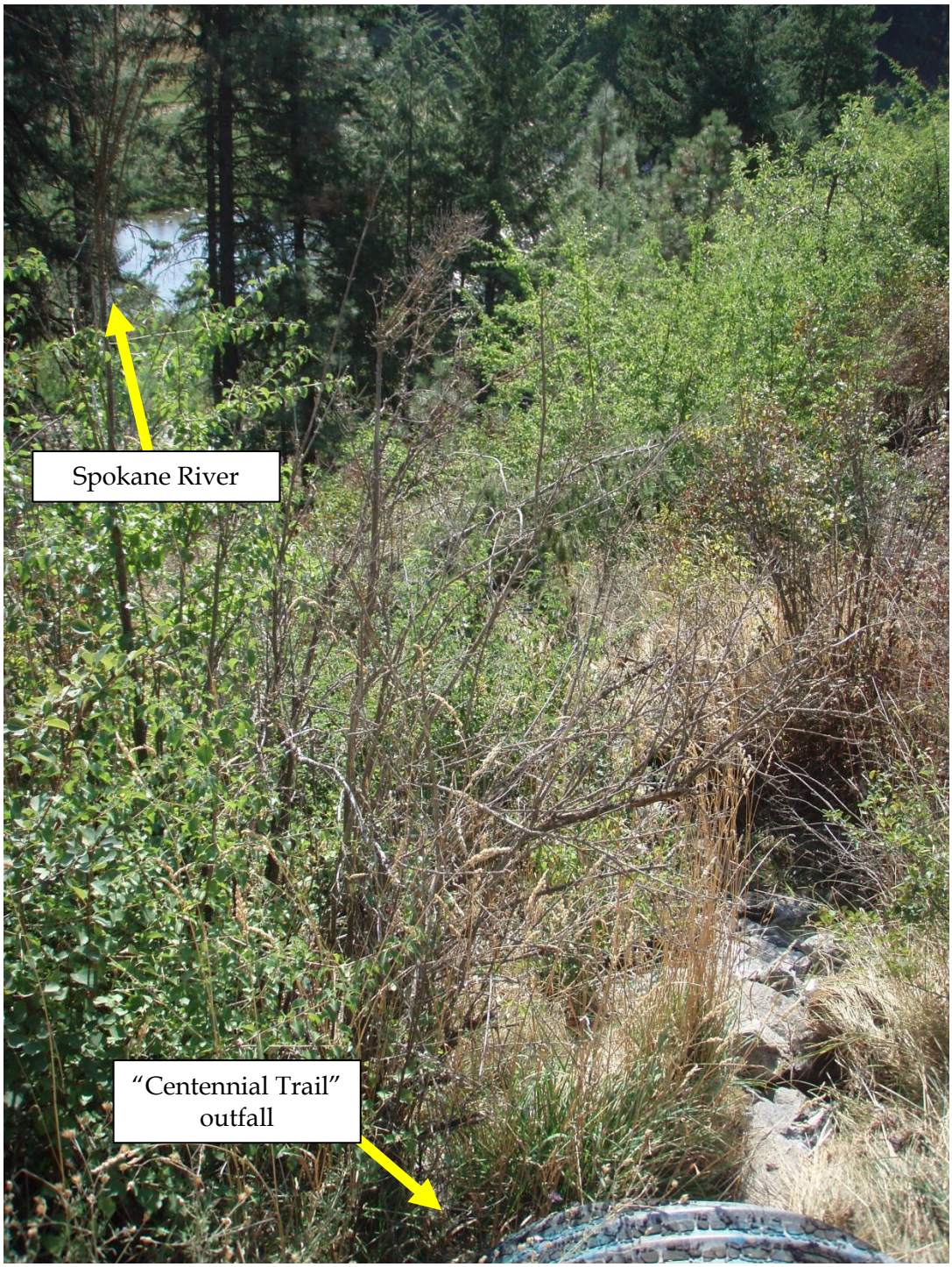
Photograph 4 (P9140522): Close up of the discharge from the "4th Avenue" outfall. City officials were unclear what the source of the discharge could have been, but speculated that overspray from residential and business water sprinklers could be the source.



Photograph 5 (P9140528): At the time of inspection, EPA observed the "4th Avenue" outfall location, seen in previous photographs. From the "4th Avenue" outfall location, stormwater is routed into a vegetated conveyance system, prior to reaching a head gate and ultimately the Spokane River. This view is of Corbin ditch and Corbin head gate, which connects to the conveyance system. According to Mr. Palus the distance from the outfall to Corbin head gate is approximately 996 feet, with a total distance of approximately 1200 feet from the outfall to the Spokane River. Mr. Werner and Mr. Froehlich indicated at the time of inspection that they had not seen stormwater flow from the "4th Avenue" outfall reach the Spokane River.

Photograph 6 (P9140526): View of the Spokane River in the background (a continuation of photograph 5 to the left) and Corbin ditch on the right. As previously mentioned the estimated distance from "4th Avenue" to the Spokane River is approximately 1200 feet.

Photograph 7 (P9140534): View of the "Centennial Trail" outfall location.



Photograph 8 (P91405236): View of the "Centennial Trail" outfall and the Spokane River in the background. According to Mr. Palus, the estimated distance from the outfall to the Spokane River is approximately 300-350 feet, including the vertical drop to the River.

Photograph 9 (P91405237): View of the "Spokane Street" outfall. At the time of inspection, Mr. Palus stated that the City had constructed a swale, with dry well, for the stormwater discharge from "Spokane Street" outfall. This swale can be seen here. Mr. Palus continued to state that the swale was constructed to contain a 24 year/2 hour rain event. Also the City had plans to seed the swale for grass growth in the fall.

Photograph 10 (P91405239): A continuation of photograph 9 to the right, showing the dry well of the constructed swale (on the left) and the Spokane River (on the right). The distance from the outfall to the Spokane River was approximately 80 feet.

Photograph 11 (P91405241): Another view of the constructed swale for stormwater discharge from "Spokane Street" outfall and the Spokane River in the background.